

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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HC2, INC.,	:	
	:	Civil Action No.: 1:20-cv-3178 (LJL)
Plaintiff-Counter Defendant,	:	
	:	
	:	
-v-	:	
	:	
	:	
ANDREW DELANEY,	:	
	:	
	:	
Defendant-Counter Claimant.	:	
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**DECLARATION OF RONALD R. ROSSI**

I, Ronald R. Rossi, declare:

1. I am a partner of the law firm of Kasowitz Benson Torres LLP, attorneys for Plaintiff-Counter Defendant HC2, Inc. ("HC2"). I am fully familiar with the pleadings in this matter and, unless otherwise indicated, I have personal knowledge of the facts herein.

2. I submit this declaration in support of HC2's motion, pursuant to Federal Rule of Civil Procedure 12(b)(6), to dismiss Defendant-Counter Claimant Andrew Delaney's Counterclaims, dated May 13, 2020 (Dkt. No. 26) (the "Counterclaims") with prejudice.

3. Attached as Exhibit A is a true and correct copy of a March 17, 2020 email from Denise Asnes of HC2 to Counter Claimant, which are quoted, in part, in the Counterclaims.

I declare under penalty of perjury that the above is true and correct. Executed this 3rd day of June 2020 in Bedford, New York

/s/ Ronald R. Rossi  
RONALD R. ROSSI

**CERTIFICATE OF SERVICE**

I hereby certify that on June 3, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Ronald R. Rossi

Ronald R. Rossi